

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
Civil Action No. 5:23-CV-00030**

**ALISON SCHULTZ, individually, and on  
behalf of all others similarly situated,**

**Plaintiff,**

**v.**

**PLANET AUTOMOTIVE GROUP, LLC,**

**Defendant.**

**Notice of Delay in Filing Certificate of  
Settlement Conference**

NOW COMES Counsel for Defendant and respectfully notifies the Court that the Certificate of Settlement Conference will be filed late, saying to the Court:

1. On May 3, 2023, Defense Counsel brought up a settlement proposal to Plaintiff's Counsel during a phone call but the two sides were unable to reach a settlement agreement.

2. On Tuesday, May 16, Counsel for Defendant sent Counsel for Plaintiff a copy of the Certificate of Settlement Conference signed by Defense Counsel and a representative for Defendant and asked Plaintiff's Counsel to sign and have his client sign.

3. Plaintiff's Counsel responded that he may not have time to meet with his client and go over the Order before the date Defense Counsel requested he return the signed Certificate of Settlement Conference to her.

4. It is Defense Counsel's understanding that Plaintiff's Counsel is actively working to obtain his client's signature and that the completed Certificate of Settlement Conference will be provided to Defense Counsel within a few days.

5. As soon as Defense Counsel receives the fully signed Certificate of Settlement

Conference, she will file it with the Court.

This, the 22<sup>nd</sup> day of May, 2023

HULL & CHANDLER

By: /s/ Elizabeth Vennum  
Elizabeth Vennnum  
N.C. State Bar No. 49747  
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### **Certificate of Service**

This is to certify that on this date the undersigned filed the foregoing using the Court's CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Craig Shapiro  
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This the 22<sup>nd</sup> day of May, 2023.

Hull & Chandler

By: /s/ Elizabeth Vennum  
Elizabeth Vennum